

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: PERCY L AMOS, JR

CHAPTER 13
CASE NO: 16-02388-NPO

OBJECTION TO SECURED CLAIM

The Debtor, whether one or more, objects to the following pre-petition secured claim and moves the Court to determine the treatment of the following claim for the purposes of plan confirmation:

Creditor:	LPP Mortgage LTD c/o Cenlar FSB 425 Phillips Blvd Trenton, NJ 08618-1430
Description of collateral:	House and Lot located at 150 N Ratliff Rd, Morton, MS 39117
Alleged Amount Owed:	\$0.00
Treatment:	Pay the alleged amount owed plus 5% interest as secured over the life of the Chapter 13 plan, with anything in excess to be paid as an unsecured non-priority debt, and upon payment of same, eliminate any lien; should the Creditor fail to file a Proof of Claim, said Creditor will be treated as an unsecured non-priority creditor, and any lien will be extinguished; if the Creditor files a Proof of Claim in an amount due for less than stated above, said amount shall be paid rather than the amount stated above.

Debtor(s) requests that in the event a timely filed and/or allowed Proof of Claim is filed by or on behalf of any of the above-mentioned Creditor evidencing an unsecured interest, that said Creditor be paid the same percentage distribution as all other unsecured creditors through the Chapter 13 plan and further requests that either upon payment of the underlying debts determined under non-bankruptcy law or a discharge under Bankruptcy Code §1328, all liens be cancelled and any and all title documents be promptly delivered to the Debtor(s).

Dated this 17th day of August, 2016.

/s/ Jonathan M. Rettig
Jonathan M. Rettig
MSB #104006
Rettig Law Group PLLC
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Hattiesburg, MS 39404
Phone: (601) 336-0603
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CERTIFICATE OF SERVICE

I, the undersigned, attorney for the above-referenced Debtor(s), do hereby certify that I have this day electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to the following: the U. S. Trustee, USTPRegion05.JA.ECF@usdoj.gov, and the Hon. Harold J. Barkley, Jr., HJB@HBarkley13.com; and I hereby certify that I have mailed, by United States Postal Service, the document, and any attachments and/or exhibits, to the following non-ECF participants:

LPP Mortgage LTD c/o Cenlar FSB
425 Phillips Blvd
Trenton, NJ 08618-1430

This 17th day of August, 2016.

/s/ Jonathan M. Rettig
Jonathan M. Rettig
MSB #104006
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